

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

R. DANTE DECAPRI,

Plaintiff,

v.

**LAW OFFICES OF SHAPIRO BROWN &
ALT, LLP,**

Defendant.

Case No. 3:14-cv-00201-HEH

CONSENT MOTION FOR EXTENSION OF TIME

Defendant Law Offices of Shapiro, Brown & Alt, LLP (“SBA”), by counsel, and with the consent of counsel for Plaintiff, hereby moves this Court for the entry of an Order extending the time within which SBA may file its Answer to Plaintiff’s Complaint until Wednesday, July 30, 2014.

1. This Court’s July 8, 2014 scheduling order requires SBA to file an Answer no later than July 18, 2014.

2. SBA submits that this Motion for Extension of Time is made in good faith, and that the granting of this motion would not unduly prejudice any party.¹

3. Counsel for SBA has conferred with Counsel for Plaintiff prior to the filing of this Motion, and Counsel for Plaintiff consented to an extension until Wednesday, July 30, 2014, as indicated by their endorsement on the [proposed] Order attached hereto as Exhibit A, which is being circulated for original endorsement by counsel and presentation to the Court for consideration and entry.

¹ SBA previously filed a motion to dismiss, and by separate motion, the parties are seeking an extension for Plaintiff to respond to such motion, and for SBA to reply.

WHEREFORE, the parties request that the present Consent Motion for Extension of Time be granted, and that SBA be permitted to file an Answer pursuant to this Court's Scheduling Order on or before Wednesday, July 30, 2014, and that the Court grant such other and further relief as the Court deems appropriate and just.

Respectfully Submitted,

**LAW OFFICES OF SHAPIRO, BROWN
AND ALT, LLP,**

By Counsel

Dated: July 16, 2014

/s/ Bizhan Beiramee

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Certificate of Service

I hereby certify that on the 16th day of July, 2014, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF System, which will then send a notification of electronic filing (NEF) to the following:

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